

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW HAMPSHIRE

Carla Gericke,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 11-CV-00231-SM
Chief Gregory C. Begin,	)	
Individually and Officially,	)	
Lieutenant James J. Carney,	)	
Individually and Officially,	)	
Sergeant Joseph Kelley,	)	
Individually and Officially,	)	
Officer Brandon Montplaisir	)	
Individually and Officially,	)	<b>PLAINTIFF'S ASSENTED-TO</b>
Weare Police Department, and	)	<b>MOTION TO EXTEND SUMMARY</b>
The Town of Weare,	)	<b>JUDGMENT DEADLINE</b>
	)	
Defendants.	)	
	)	

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COMES NOW the Plaintiff, Carla Gericke, by and through the undersigned Counsel and for her Assented-to Motion to Extend Summary Judgment Deadline, states and moves this Honorable Court as follows:

1. This Motion is brought pursuant to, and in accordance with, Local Rule 7.1.
2. On August 16, 2011, this Honorable Court entered a Pre-trial Order approving the Parties Proposed Discovery Plan.
3. Currently, the Summary Judgment Deadline for all Parties is scheduled for May 1, 2012. The Trial Date is scheduled for the two-week period beginning September 18, 2012.
4. Plaintiff requires additional time to file her Motion for Summary Judgment. Plaintiff requests that this Honorable Court extend the Summary Judgment Deadline from May 1, 2012 to May 7, 2012.

5. Plaintiff understands that if this Honorable Court extends the deadline as requested, it will not result in trial being scheduled less than four months after the Summary Judgment Deadline. Therefore, extending the deadline to May 7, 2012 does not appear to affect the trial date.
6. This Motion is fully assented-to.
7. Plaintiff is not attaching a Memorandum of Law as granting or denying this Motion is within the sound discretion of this Honorable Court.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court grant the following relief:

- A. Grant this Motion and extend the Summary Judgment deadline to May 7, 2012; and
- B. Grant any further relief that this Honorable Court deems just and proper.

Dated: April 30, 2012

Respectfully submitted,  
Carla Gericke,  
By, The Law Offices of  
Martin & Hipple, PLLC

/s/Stephen T. Martin  
Stephen T. Martin, Esq.  
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**CERTIFICATE OF SERVICE**

COMES NOW Attorney Stephen T. Martin, Counsel for the Plaintiff, and hereby certifies that I have caused a copy of the foregoing Motion to be delivered to Counsel for the Defendants using this Court's CM/ECF system.

Dated: April 30, 2012

/s/Stephen T. Martin  
Stephen T. Martin, Esq.